

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:	JONATHAN DANIEL CLARK,	:	Case No. 23-52222
		:	Chapter 13
	Debtor.	:	Judge John E. Hoffman, Jr.

**OBJECTION OF THE DEBTOR TO CLAIM NO. 7 OF CREDITOR
EXETER FINANCE LLC**

Now comes Debtor JONATHAN DANIEL CLARK, by and through the undersigned counsel, and hereby objects to Claim No. 7 of Creditor EXETER FINANCE LLC. Said claim was filed as a secured claim on 19 July 2023. The Debtor claims that the 2015 Mitsubishi Lancer referenced in the Proof of Claim was repossessed by Exeter Finance LLC around June 2023. Therefore, the Debtor respectfully submits that no collateral securing said claim exists and that the entire claim should be treated as unsecured.

The claimant's name and address is:

Exeter Finance LLC
c/o AIS Portfolio Services, LLC
4515 N. Santa Fe Ave. Dept. APS
Oklahoma City OK 73118

WHEREFORE, the Debtor respectfully requests that the entire claim of Creditor EXETER FINANCE LLC should be treated as a general unsecured claim of the estate for the purpose of distribution.

Respectfully submitted,

/s/ Mark Albert Herder

Mark Albert Herder (0061503)
Attorney for the Debtor
MARK ALBERT HERDER, LLC
1031 East Broad Street
Columbus, Ohio 43205
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NOTICE OF OBJECTION OF THE DEBTOR

Please take notice that the Debtor has filed the foregoing Objection.

Your rights may be affected, and your claim may be reduced, modified or eliminated.

You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

Pursuant to the Bankruptcy Rules, an Objection to this Motion must be filed with the Court in writing, requesting a hearing and setting forth the legal and factual basis for the opposition, and be served upon the Chapter 13 Trustee, the Debtor, and the Debtor's attorney accompanied by an appropriate Certificate of Service, within thirty (30) days from the date of service of this notice, or the Court may decide that you do not oppose the relief sought and may enter an order granting the requested relief.

The address for the Court is: United States Bankruptcy Court
Clerk's Office
170 North High Street
Columbus, Ohio 43215

The address for the Chapter 13 Trustee is: Faye English
Standing Chapter 13 Trustee
10 West Broad Street, Suite 1600
Columbus, Ohio 43215

The address for the Debtor is: Jonathan Daniel Clark
4450 Palamino Drive
Columbus, OH 43207-5220

The address for the attorney for Debtor is: Mark Albert Herder
1031 East Broad Street
Columbus, Ohio 43205

The files regarding bankruptcy cases are available for all to inspect on the first floor (Clerk's Office) at the address set forth above.

Dated: 11 August 2023

/s/ Mark Albert Herder
Mark Albert Herder (0061503)

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and accurate copy of the preceding Objection was duly served this date on the following registered ECF participants, electronically through the Court's ECF system at the email address registered with the Court:

Asst. U.S. Trustee (Col) – via ECF

Faye D. English, Chapter 13 Trustee – via ECF

Cynthia A Jeffrey – via ECF

and on the following by **ordinary U.S. Mail** addressed to:

Jonathan Daniel Clark, 4450 Palamino Drive, Columbus, OH 43207-5220

Exeter Finance LLC, c/o AIS Portfolio Services, LLC, 4515 N. Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118

Cynthia A Jeffrey, Keith D. Weiner & Assoc. Co., L.P.A., 1100 Superior Avenue East, Suite 1100, Cleveland, OH 44114

Dated: 11 August 2023

/s/ Mark Albert Herder
Mark Albert Herder (0061503)